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December 18, 2023

VIA ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 12/18/2023

Re: *Adel Y. Al Ghanem v. Intrepid Acquisition Holdings, et al.*, No. 23-cv-10187-VSB
Request to File Sealed Documents

Dear Judge Broderick:

We write on behalf of our client Adel Y. Al Ghanem (“**Plaintiff**”), the Plaintiff in the above-referenced action. We write respectfully to request that Plaintiff’s Reply Memorandum of Law in further support of his Motion for a Temporary Restraining Order and Preliminary Injunction, as well as the accompanying declarations and exhibits (collectively, the “Reply Documents”), be filed under seal. The Reply Documents contain information and documents produced by Defendants and certain non-parties that have been designated as confidential. Plaintiff seeks permission to seal the Reply Documents in their entirety only temporarily, given the expedited nature of these proceedings and the short time frame within which discovery was conducted. Immediately upon filing, Plaintiff intends to meet and confer with Defendants and other producing parties regarding limited, narrowly tailored proposed redactions, consistent with Rules 5.B.ii-iii of Your Honor’s Individual Rules & Practices in Civil Cases.

The present request is being made for the same reasons set forth in Plaintiff’s prior Letter Motions to Seal filed in this case (Dkts. 5 & 62)—which Your Honor granted (Dkts. 29 & 67)—namely, to protect national security interests and other potentially confidential information. To advance judicial economy, Plaintiff hereby incorporates by reference the factual assertions and legal argument contained in Plaintiff’s prior Letter Motions to Seal (Dkts. 5 & 62). For the same reasons stated therein, Plaintiff respectfully requests that the Court permit the filing of the Reply Documents under seal, pending a meet and confer regarding proposed redactions.

quinn emanuel urquhart & sullivan, llp

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read "D. Hranitzky", with a stylized flourish at the end.

Dennis Hranitzky